SERFF Tracking #: AGNN-130229710 State Tracking #:

Company Tracking #: SOV INFORMATIONAL_INDEX INTEREST RIDERS

State: District of Columbia Filing Company: American General Life Insurance Company

TOI/Sub-TOI: A021 Individual Annuities - Deferred Non - Variable/A021.004 Modified Single Premium

Product Name: SOV INFORMATIONAL_Index Interest Riders

Project Name/Number: SOV INFORMATIONAL_Index Interest Riders/SOV INFORMATIONAL_Index Interest Riders

Filing at a Glance

Company: American General Life Insurance Company
Product Name: SOV INFORMATIONAL_Index Interest Riders

State: District of Columbia

TOI: A02I Individual Annuities - Deferred Non - Variable

Sub-TOI: A02I.004 Modified Single Premium

Filing Type: Form

Date Submitted: 09/02/2015

SERFF Tr Num: AGNN-130229710

SERFF Status: Closed-FILED FOR INFORMATION

State Tr Num:

State Status:

Co Tr Num: SOV INFORMATIONAL_INDEX INTEREST RIDERS

Implementation On Approval

Date Requested:

Author(s): LaDonna Bruce

Reviewer(s): John Rielley (primary)

Disposition Date: 09/03/2015

Disposition Status: FILED FOR INFORMATION

Implementation Date: 09/03/2015

State: District of Columbia Filing Company: American General Life Insurance Company

TOI/Sub-TOI: A021 Individual Annuities - Deferred Non - Variable/A021.004 Modified Single Premium

Product Name: SOV INFORMATIONAL_Index Interest Riders

Project Name/Number: SOV INFORMATIONAL Index Interest Riders/SOV INFORMATIONAL Index Interest Riders

General Information

Project Name: SOV INFORMATIONAL_Index Interest Riders Status of Filing in Domicile: Pending

Project Number: SOV INFORMATIONAL_Index Interest Riders Date Approved in Domicile:

Requested Filing Mode: Informational Domicile Status Comments: Filing simultaneously.

Explanation for Combination/Other: Market Type: Individual Submission Type: New Submission Individual Market Type:

Overall Rate Impact: Filing Status Changed: 09/03/2015

State Status Changed:

Deemer Date: Created By: LaDonna Bruce

Submitted By: LaDonna Bruce Corresponding Filing Tracking Number:

Filing Description:

Statement of Variability Applicable to the Following Forms:

AGE-8003 (12/12) Annual Point-To-Point Index Interest Account Rider

AGE-8005 (12/12)Monthly Point-To-Point Additive Index Interest Account Rider

AGE-8024 (9/13) Periodic Average Index Interest Account Rider

AGE-8028 (4/14) [N-Year] Point-to-Point with Annual Spread Index Interest Account Rider

The revised Statement of Variability ("SOV") for the following forms is being submitted for your information to update the SOV previously approved for the rider in your state.

AGE-8003 (12/12)_AGE-8005 (12/12), Approved on 03/22/2013, SERFF Tracking # AGNN-128914308

AGE-8024 (9/13), Approved on 10/30/2013, SERFF Tracking # AGNN-129258939

AGE-8028 (4/14), Approved on 08/14/2014, SERFF Tracking # AGNN-129672988

SOV AGE-8028 (4/14) Informational Filing, Approved on 10/16/2014, SERFF Tracking # AGNN- 129765327

The attached SOV's were filed with brackets around the index; the enclosed updated Statement of Variability revises the Index section to include other index options. We would like to revise this section of the SOV as well as adjust some of the general language in other SOV explanations to be more clear. All references in the Rider and the SOV were previously bracketed and we believe that this change is within the bounds of what is permissible through the use of bracketing.

To the best of our knowledge and belief, this submission is in compliance with the statutes and regulations of your state and contains nothing that had been previously objected to or disapproved by your department. No part of this filing contains any unusual or possibly controversial items from normal company or industry standards.

Thank you for accepting this revised version of the SOV.

If you have any questions, or need additional information to complete your review, please call me at 800-262-4764 xt8316050 or email me at ladonna.bruce@valic.com.

Sincerely, LaDonna Bruce Legal Analyst

Company and Contact

Filing Contact Information

SERFF Tracking #: AGNN-130229710 State Tracking #:

Company Tracking #: SOV INFORMATIONAL_INDEX

INTEREST RIDERS

State: District of Columbia Filing Company: American General Life Insurance Company

TOI/Sub-TOI: A021 Individual Annuities - Deferred Non - Variable/A021.004 Modified Single Premium

Product Name: SOV INFORMATIONAL_Index Interest Riders

Project Name/Number: SOV INFORMATIONAL_Index Interest Riders/SOV INFORMATIONAL_Index Interest Riders

LaDonna Bruce, Legal Analyst LaDonna.Bruce@valic.com

2919 Allen Pkwy, L10-30 800-262-4764 [Phone] 8316050 [Ext]

Houston, TX 77019

Filing Company Information

American General Life Insurance CoCode: 60488 State of Domicile: Texas

Company Group Code: 12 Company Type: 2929 Allen Parkway L10-30 Group Name: State ID Number:

Houston, TX 77019-2155 FEIN Number: 25-0598210

(713) 831-6006 ext. [Phone]

Filing Fees

Fee Required? No Retaliatory? No

Fee Explanation:

State: District of Columbia Filing Company: American General Life Insurance Company

TOI/Sub-TOI: A021 Individual Annuities - Deferred Non - Variable/A021.004 Modified Single Premium

Product Name: SOV INFORMATIONAL_Index Interest Riders

Project Name/Number: SOV INFORMATIONAL_Index Interest Riders/SOV INFORMATIONAL_Index Interest Riders

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
FILED FOR INFORMATION	John Rielley	09/03/2015	09/03/2015

State: District of Columbia Filing Company: American General Life Insurance Company

TOI/Sub-TOI: A021 Individual Annuities - Deferred Non - Variable/A021.004 Modified Single Premium

Product Name: SOV INFORMATIONAL_Index Interest Riders

Project Name/Number: SOV INFORMATIONAL_Index Interest Riders/SOV INFORMATIONAL_Index Interest Riders

Disposition

Disposition Date: 09/03/2015 Implementation Date: 09/03/2015 Status: FILED FOR INFORMATION

Comment:

Rate data does NOT apply to filing.

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	SOVs	FILED FOR INFORMATION ONLY/NO APPROVAL	Yes
Supporting Document	Redline SOV's		Yes

State: District of Columbia Filing Company: American General Life Insurance Company

TOI/Sub-TOI:

A021 Individual Annuities - Deferred Non - Variable/A021.004 Modified Single Premium

Product Name:

SOV INFORMATIONAL_Index Interest Riders

Project Name/Number: SOV INFORMATIONAL_Index Interest Riders/SOV INFORMATIONAL_Index Interest Riders

Supporting Document Schedules

Satisfied - Item:	SOVs
Comments:	
Attachment(s):	SOV AGE-8003 and AGE-8005 Index Riders final CLEAN.pdf SOV AGE-8024 Monthly Avg Revised - CLEAN.pdf SOV AGE-8028 PTP Revised - CLEAN.pdf
Item Status:	FILED FOR INFORMATION ONLY/NO APPROVAL
Status Date:	09/03/2015
Satisfied - Item:	Redline SOV's
Comments:	
Attachment(s):	SOV AGE-8003 and AGE-8005 Index Riders final RED.pdf SOV AGE-8024 Monthly Avg Revised - RED.pdf SOV AGE-8028 PTP Revised - RED.pdf
Item Status:	
Status Date:	

Form Number Form Description

AGE-8003 (12/12) Annual Point-To-Point Index Interest Account Rider AGE-8005 (12/12) Monthly Point-To-Point Additive Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Annual Point-To-Point Index Interest Account Rider AGE-8003 (12/12)

PAGE No.	BRACKETED VARIABLE TEXT	DESCRIPTION	
Rider Data Page	Rider Effective Date, Index Value on Rider Effective Date	Customer specific information that will change for each contract issued. This item depends on the date when the Rider is issued.	
Rider Data Page and Page 2	Index	May reference Standard & Poor's®; S&P 500®; or S&P® which are trademarks of Standard & Poor's Financial Services LLC. An Index provider disclaimer regarding the Index may appear in the definition of the Index or elsewhere within the Rider. The index shown may change in the future for new issues of the contract and may include one or more of the following or any other broad major market indices:	
		 NASDAQ 100 Index Dow 30SM S&P Midcap 400[®] MSCI EAFE Index Russell 1000 Index Russell 2000 Index Russell 3000 Index Euro STOXX 50[®] Hang Seng Index NIKKEI 500 Index MSCI World Risk Control 10% Index MSCI World Risk Control 12.5% Index MSCI World Risk Control 15% Index S&P 500 Daily Risk Control 12% Index S&P 500 Daily Risk Control 10% Index 	
		The index is bracketed so we have flexibility to add or suppress the index. If we suppress the index due to discontinuation of the index, if the composition or the calculation of the index is changed, or if we are not able to secure a license to continue using the index, we may substitute an alternate, comparable index. Any Index available will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.	

Form Number

Form Description

AGE-8003 (12/12) Annual Point-To-Point Index Interest Account Rider AGE-8005 (12/12) Monthly Point-To-Point Additive Index Interest Account Rider

Rider Data Page	Index Term	Current information shown. The Index Term may change in the future for new issues of the contract and the range is from 1 year to 10 years.
Rider Data Page	Initial Participation Rate	The Initial Participation Rate for the Annual Point-To-Point Index Interest Account Rider is shown. The Initial Participation Rate is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Participation Rate, and may change in the future for new issues of the contract. The range is from the Minimum Participation Rate to 200%. Any Participation Rates will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Minimum Participation Rate	The Minimum Participation Rate for the Annual Point-To-Point Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the life of the contract. It may change in the future for new issues of the contract. The range is from 0.25% to 100%. Any Minimum Participation Rates will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Initial Index Rate Cap	If applicable at contract issue, the Initial Index Rate Cap for the Annual Point-To-Point Index Interest Account Rider for each specific contract will be shown. The Initial Index Rate Cap is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Index Rate Cap and may change in the future for new issues of the contract. The range is from the Minimum Index Rate Cap to 25%. If referenced but not applicable, the word "None" will be shown. Any Index Rate Caps will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.

Form Number Form Description

AGE-8003 (12/12) Annual Point-To-Point Index Interest Account Rider AGE-8005 (12/12) Monthly Point-To-Point Additive Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Rider Data Page	Minimum Index Rate Cap	If applicable, the Minimum Index Rate Cap for the Annual Point-To-Point Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the specified period of time during the life of the contract as shown. It may change in the future for new issues of the contract. The range of years is from 1 year to the life of the contract and the range for the Minimum Index Rate Cap is from 0.25% to 25%. If referenced but not applicable, the word "None" will be shown. Any Minimum Index Rate Caps will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Last Page	Officer Signatures & Titles	Current signatures and titles shown. In the event of a change in company officers, the new officer's signature and title will be shown.

Monthly Point-To-Point Additive Index Interest Account Rider AGE-8005 (12/12)

PAGE No.	BRACKETED VARIABLE TEXT	DESCRIPTION
Rider Data Page	Rider Effective Date, Index Value on Rider Effective Date	Customer specific information that will change for each contract issued. This item depends on the date when the Rider is issued.
Rider Data Page and Page 2	Index	Current information shown. May reference Standard & Poor's®; S&P 500®; or S&P® which are trademarks of Standard & Poor's Financial Services LLC. An Index provider disclaimer regarding the Index may appear in the definition of the Index or elsewhere within the Rider. The index shown may change in the future for new issues of the contract and may include one or more of the following or any other broad major market indices:
		 ML Strategic BalancedSM NASDAQ 100 Index Dow 30SM

Form Number

Form Description

AGE-8003 (12/12) Annual Point-To-Point Index Interest Account Rider AGE-8005 (12/12) Monthly Point-To-Point Additive Index Interest Account Rider

		S&P Midcap 400® MSCI EAFE Index Russell 1000 Index Russell 2000 Index Russell 3000 Index Russell 3000 Index Hang Seng Index NIKKEI 500 Index MSCI World Risk Control 10% Index MSCI World Risk Control 15% Index S&P 500 Daily Risk Control 12% Index S&P 500 Daily Risk Control 10% Index S&P 500 Daily Risk Control 10% Index S&P 500 Daily Risk Control 10% Index The index is bracketed so we have flexibility to add or suppress the index. If we suppress the index due to discontinuation of the index, if the composition or the calculation of the index is changed, or if we are not able to secure a license to continue using the index, we may substitute an alternate, comparable index. Any Index available will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Index Term	Current information shown. The Index Term may change in the future for new issues of the contract and the range is from 1 year to 10 years.
Rider Data Page	Initial Participation Rate	The Initial Participation Rate for the Monthly Point-To-Point Additive Index Interest Account Rider will be shown. The Initial Participation Rate is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Participation Rate, and may change in the future for new issues of the contract. The range is from the Minimum Participation Rate to 200%. Any Participation Rates will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Minimum Participation Rate	The Minimum Participation Rate for the Monthly Point-To-Point Additive Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the life of the contract. It may change in the future for new issues of the

Form Number

Form Description

AGE-8003 (12/12) Annual Point-To-Point Index Interest Account Rider AGE-8005 (12/12) Monthly Point-To-Point Additive Index Interest Account Rider

		contract. The range is from 0.25% to 100%. Any Minimum Participation Rates will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Initial Index Rate Cap	If applicable at contract issue, the Initial Index Rate Cap for the Monthly Point-To-Point Additive Index Interest Account Rider for each specific contract will be shown. The Initial Index Rate Cap is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Index Rate Cap and may change in the future for new issues of the contract. The range is from the Minimum Index Rate Cap to 25%. If referenced but not applicable, the word "None" will be shown. Any Index Rate Caps will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Minimum Index Rate Cap	If applicable, the Minimum Index Rate Cap for the Monthly Point-To-Point Additive Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the specified period of time during the life of the contract as shown. It may change in the future for new issues of the contract. The range of years is from 1 year to the life of the contract and the range for the Minimum Index Rate Cap is from 0.25% to 25%. If referenced but not applicable, the word "None" will be shown. Any Minimum Rate Caps will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Last Page	Officer Signatures & Titles	Current signatures and titles shown. In the event of a change in company officers, the new officer's signature and title will be shown.

Form Number

Form Description

AGE-8024 (9/13) Periodic Average Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Periodic Average Index Interest Account Rider AGE-8024 (9/13)

PAGE No.	BRACKETED VARIABLE TEXT	DESCRIPTION
Rider Data Page	Rider Effective Date, Initial Index Term Start Date, Index Value on Rider Effective Date	Customer specific information that will change for each contract issued. This item depends on the date when the Rider is issued.
Rider Data Page and Page 2	Index	Additional information about the index may be provided herein. The index shown may change in the future for new issues of the contract and may include one or more of the following or any other broad major market indices: S&P 500® ML Strategic BalancedSM NASDAQ 100 Index Dow 30SM S&P Midcap 400® MSCI EAFE Index Russell 1000 Index Russell 2000 Index Russell 3000 Index Euro STOXX 50® Hang Seng Index NIKKEI 500 Index MSCI World Risk Control 10% Index MSCI World Risk Control 12.5% Index MSCI World Risk Control 15% Index S&P 500 Daily Risk Control 15% Index S&P 500 Daily Risk Control 12% Index S&P 500 Daily Risk Control 10% Index The index is bracketed so we have flexibility to add or suppress the index. If we suppress the index due to discontinuation of the index, if the composition or the calculation of the index is changed, or if we are not able to secure a license to continue using the index, we may substitute an alternate, comparable index. Any Index available will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Index Term	The Index Term may change in the future for new issues of the contract and the range is from 1 year to 10 years. Any Index Term will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and

Form Number

Form Description

AGE-8024 (9/13) Periodic Average Index Interest Account Rider

		administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Averaging Mode	If the Averaging Mode is quarterly, the word "Quarterly" will show. Any Averaging Mode will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	First Date Included in Average, Last Date Included in Average, Number of Index Values Included in Average	The range is from 1-120 to correspond with the number of years in an index term and depends on if the averaging mode is monthly or quarterly. Any Date Included in Average or Number of Index Values Included in Average will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Initial Participation Rate	If applicable at contract issue, the Initial Participation Rate for the Periodic Average Index Interest Account Rider will be shown. The Initial Participation Rate is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Participation Rate, and may change in the future for new issues of the contract. The range is from the Minimum Participation Rate to 200%. Any Participation Rates will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Minimum Participation Rate	If applicable, the Minimum Participation Rate for the Periodic Average Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the life of the contract. It may change in the future for new issues of the contract. The range is from 0.25% to 100%. Any Minimum Participation Rates will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Initial Spread	If applicable at contract issue, the Initial Spread percentage for the Periodic Average Index Interest Account Rider for each specific contract will be shown. If applicable the Initial Spread percentage is set at issue, is guaranteed for the Index Term, will not be greater than the Maximum Spread, and may change in the future for new issues of the contract. The percentage range is from 0% to the Maximum Spread. If referenced but not applicable, the word "None" will be shown. Any Initial Spread will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.

Form Number

Form Description

AGE-8024 (9/13) Periodic Average Index Interest Account Rider

Rider Data Page	Maximum Spread	If applicable, the Maximum Spread percentage for the Periodic Average Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the life of the contract. It may change in the future for new issues of the contract. The range of years is from 1 year to the life of the contract and the percentage range for the Maximum Spread is from 0% to 20%. If referenced but not applicable, the word "None" will be shown. Any Maximum Spread will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Initial Index Rate Cap	If applicable at contract issue, the Initial Index Rate Cap for the Periodic Average Index Interest Account Rider for each specific contract will be shown. The Initial Index Rate Cap is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Index Rate Cap and may change in the future for new issues of the contract. The range is from the Minimum Index Rate Cap to 25%. If referenced but not applicable, the word "None" will be shown. Any Index Rate Caps will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Minimum Index Rate Cap	If applicable, the Minimum Index Rate Cap for the Periodic Average Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the specified period of time during the life of the contract as shown. It may change in the future for new issues of the contract. The range of years is from 1 year to the life of the contract and the range for the Minimum Index Rate Cap is from 0.25% to 25%. If referenced but not applicable, the word "None" will be shown. Any Minimum Rate Caps will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Pages 2-9	"Monthly" and "Month"	If this rider is offered with a Quarterly Average, all references to "Monthly" or "Month" will be changed to reference "Quarterly", "Quarter" as applicable and will apply to prospectively issued Riders. Any mode will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Page 2	Index Term	The range is from the 1 st contract anniversary to the 10 th contract anniversary. The Examples are bracketed to allow for future updates to keep the examples current.

Form Number

Form Description

AGE-8024 (9/13) Periodic Average Index Interest Account Rider

Page 4	Calculation of Index Interest Percentage	If the Number of Index Values Included in Average is less than the full number of months or quarters, as applicable, in an index term, the number that corresponds to the Number of Index Values Included in Average will print in lieu of "twelve (12)". Under the same circumstance, "last [x]" will be referenced in front of the words "[monthly] Index Values ending with" in the second sentence and x will be in a range from 1-120 months or quarters, as applicable. If the Number of Index Values Included in the Average equals the full number of months or quarters, as applicable, in an index term the words "last [x]" will not print.
		If the Number of Index Values Included in Average is less than the full number of months or quarters, as applicable, in an index term, the following will print in addition to the language shown in the Rider and the range for x is from 1-120 months or quarters, as applicable: "When an Income Plan begins less than [(x) months] following the beginning of an Index Term or in the event of payment of a death benefit less than [(x) months] following the beginning of an Index Term, the average of the [monthly] Index Values is calculated in the following manner. Add together the [monthly] Index Values since the beginning of such Index Term up to and including the [monthly] Index Value on the [Monthly] Anniversary immediately preceding the date such Income Plan begins or immediately preceding the date We receive all Required Documentation at Our Annuity Service Center for payment of the death benefit since the beginning of the Index Term, and divide that sum by the number of full [months] since the beginning of the Index Term."
Page 4	Calculation of Index Interest, 3 rd bullet	If the Index Term is greater than 1-year, the number of days will
Pages 5-9	Examples	be adjusted accordingly. The examples are bracketed and will be modified to reflect a quarterly Averaging Mode and/or an Index Term that is longer than one year, as applicable. An example that may be referenced is below:
		Example 1: Assume that \$10,000 is allocated to this Index Interest Account with a 3-year Index Term, a Spread, no Index Rate Cap, and the Contract is issued on January 5, 2014. Also assume that there have been no partial Withdrawals.
		In this example, assume the following: • The Averaging Mode is Quarterly
		The First Date Included In Average is April 5, 2014

Form Number

Form Description

AGE-8024 (9/13) Periodic Average Index Interest Account Rider

		 The Number of The Participation The Spread is 5 There is no Inde The beginning In 	.00% ex Rate Cap ndex Value is 1,000 Index Values sh	•
			Date	Index Value
			January 5, 2014	1,000
			April 5, 2014	1,050
			July 5, 2014	1,115
			October 5, 2014	1,190
			January 5, 2015	1,250
			April 5, 2015	1,100
			July 5, 2015	1,020
			October 5, 2015	980
			January 5, 2016	1,030
			April 5, 2016	1,040
			July 5, 2016	1,120
			October 5, 2016	1,080
			January 5, 2017	1,150
		1,030 + 1,040 + (b) 1,094 - 1,000 = (c) 94 / 1,000 = 9.4 (d) 9.40% x 100% = (e) 9.40% - 5.00% = (f) 4.40% since the	1,120 + 1,080 + 1,1 94 0% = 9.40%	Cap for comparison
		Index Interest Percenta		t Account = \$10,000 x
Last Page	Officer Signatures & Titles	4.40% = \$440 Current signatures and company officers, the n shown.		•

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

[N-Year] Point-To-Point With Annual Spread Index Interest Account Rider AGE-8028 (4/14)

PAGE No.	BRACKETED	DESCRIPTION
	VARIABLE TEXT	
Rider Data	Rider Effective Date,	Customer specific information that will change for each contract
Page	Index Value on Rider Effective Date	issued. This item depends on the date when the Rider is issued.
Rider Data Page and Page 2	Index	Additional information about the index may be provided herein. The index shown may change in the future for new issues of the contract and may include one or more of the following or any other broad major market indices: S&P 500® ML Strategic Balanced SM NASDAQ 100 Index Dow 30 SM S&P Midcap 400® MSCI EAFE Index Russell 1000 Index Russell 2000 Index Russell 3000 Index Hang Seng Index NIKKEI 500 Index MSCI World Risk Control 10% Index MSCI World Risk Control 12.5% Index MSCI World Risk Control 15% Index MSCI World Risk Control 15% Index S&P 500 Daily Risk Control 10% Index

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

Rider Data Page, Page	"N-Year" and Index Term	"N" is a variable that represents the duration of the Index Term. The duration of the Index Term is set at contract issue and is
2 and Page	161111	guaranteed for the life of the Rider but could change for
7		prospectively issued contracts. The Index Term may change in
		the future for new issues of the contract and the range is from 1 year to 10 years.
		your to 10 yours.
		When the Index Term ("N") is 1 year, the word "Annual" will be used in the title of the Rider as follows: "Annual Point-To-Point With Annual Spread Index Interest Account Rider. If "N" is other than 1, then the number will be referenced (example for a 2 Year Point-To-Point Rider: 2-Year Point-To-Point With Annual Spread
		Index Interest Account Rider".
		The example on page 2 under the definition of Index Term is bracketed to allow for updates to the examples to be consistent with the specific Index Term (i.e., if Annual, a one year period example will be shown; if a 2-Year term, a 2-Year period example will be shown).
		Any Index Term will be determined by factors such as then
		current economic conditions, expenses related to pricing,
		actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Initial Participation Rate	If applicable at contract issue, the Initial Participation Rate for the [N-Year] Point-To-Point With Annual Spread Index Interest
		Account Rider is shown. The Initial Participation Rate is set at issue, is guaranteed for the Index Term, will not be less than the
		Minimum Participation Rate, and may change in the future for
		new issues of the contract. The range is from the Minimum
		Participation Rate to 200%. Any Participation Rates will be determined by factors such as then current economic
		conditions, expenses related to pricing, actuarial and
		administrative considerations and specific distribution systems
Rider Data	Minimum Participation	marketing the contract. If applicable the Minimum Participation Rate for the [N-Year]
Page	Rate	Point-To-Point With Annual Spread Index Interest Account Rider
		for each specific contract will be shown. It will be set at issue and
		guaranteed for the life of the contract. It may change in the future for new issues of the contract. The range is from 0.25% to 100%.
		Any Minimum Participation Rates will be determined by factors
		such as then current economic conditions, expenses related to
		pricing, actuarial and administrative considerations and specific
		distribution systems marketing the contract.

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

Rider Data Page	Initial Annual Spread	If applicable at contract issue, the Initial Annual Spread for the [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider for each specific contract will be shown. The Initial Annual Spread is set at issue, is guaranteed for the Index Term, will not be less than the Maximum Annual Spread and may change in the future for new issues of the contract. The range is from 0% to the Maximum Annual Spread. If referenced, but not applicable, the word "None" will be shown. Any Annual Spreads will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Maximum Annual Spread	If applicable, the Maximum Annual Spread for the [N-Year] Annual Point-To-Point With Annual Spread Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the specified period of time during the life of the contract. It may change in the future for new issues of the contract. The range of years is from 1 year to the life of the contract and the range for the Maximum Annual Spread is from 0% to 20%. If referenced, but not applicable, the word "None" will be shown. Any Maximum Annual Spread will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Initial Interest Bonus Rate	If applicable at contract issue, the Initial Interest Bonus Rate for the [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider for each specific contract will be shown. The Initial Interest Bonus Rate is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Interest Bonus Rate and may change in the future for new issues of the contract. The range is from the Minimum Interest Bonus Rate to 100%. If referenced, but not applicable, the word "None" will be shown. Any Initial Interest Bonus Rate will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

Rider Data Page	Minimum Interest Bonus Rate	If applicable, the Minimum Interest Bonus Rate for the [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the life of the contract. It may change in the future for new issues of the contract. The range for the Minimum Interest Bonus Rate is from 0% to 100%. If referenced, but not applicable, the word "None" will be shown. Any Minimum Interest Bonus Rate will be determined by factors such as then current economic condition, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Page 3	Partial Index Interest	The section titled Partial Index Interest is bracketed to either include the language shown on the Rider when the index term is greater than 1-Year or exclude it when the index term is 1-Year. When the index term is 1-Year, the following will be referenced: Since Index Interest is determined at the end of each Index Term, no Index Interest will be credited to: "1. the amount paid as a full surrender occurring prior to the end of an Index Term; or 2. the amount paid as a partial Withdrawal occurring prior to the end of an Index Term. Upon payment of a death benefit or when an Income Plan begins, partial Index Interest will be credited to any values that are allocated to the Index Interest Account, as described in this Rider and the Contract."

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

Pages 3-4	Calculation of Index Interest Percentage	The language is bracketed to include the language shown on the Rider when the Index Term is greater than 1-Year and includes an Annual Spread. When the Index Term is 1-Year, then the following language will be referenced:
		The Index Interest Percentage calculation will be performed as follows: (a) Equals the ending Index Value minus the beginning Index Value (b) Equals (a) divided by the beginning Index Value (c) Equals (b) multiplied by the Participation Rate (d) Equals (c) minus the Annual Spread (e) Equals the greater of (d) or zero percent (f) Equals 1 plus the Interest Bonus Rate (g) Equals (e) multiplied by (f); which is the Index Interest Percentage
		The ending Index Value is the Index Value on: 1) the last day of the Index Term; or 2) the date an Income Plan begins or the date We receive all Required Documentation at our Annuity Service Center for payment of the death benefit.
Page 4	Calculation of Index Interest: 2 nd Bullet	The following language: "adjusted for Index Interest credited" is bracketed to allow for inclusion or exclusion of the language. When the Index Term is greater than 1-Year, the language will be referenced. When the Index Term is 1-Year, the language will not be referenced.
Page 4	Calculation of Index Interest: 4 th Bullet Example	The example is bracketed to allow for flexibility to show an example that is relative to the index term. If the index term is for 1 year, the example will be for a 1-Year period; if the index term is for more than 1-Year, the example will be for longer than a 1-Year period.
Page 4	Calculation of Index Interest: 5 th Bullet	The language is bracketed to allow for inclusion or exclusion of the language. When the Index Term is greater than 1-Year, the language will be referenced. When the Index Term is 1-Year, the language will not be referenced.

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

Page 5	General Example Assumptions	The General Example Assumptions section is bracketed to allow for flexibility relative to the index term Referenced language in the Rider is applicable to a 2-Year index term. The number of years is bracketed for the Index Term to allow for flexibility to show the applicable number of years in the index term in the General Examples. Examples of alternative language for a 1-Year index term are below and the referenced table in the Rider will not be referenced for a 1-Year index term. Alternative Language: General Example Assumptions:
		 The Index Term is [1 year] The issue date is 10/1/2014 \$10,000 is allocated to the Index Interest Account The Participation Rate is 100% The Annual Spread is 2.00% The Interest Bonus Rate is 0.00% The Index Value on 10/1/2014 is 1,000

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Pages 5-7	General Examples	General Examples are bracketed to allow for flexibility to show examples on the Rider relative to the Index Term (i.e., if a 2-Year term the examples will be for a 2-Year term). Alternative examples are below for a 1-Year index term: Alternative Language:
		General Examples: Example 1 – No activity before the end of an Index Term with Index Interest credits. Assume that \$10,000 is allocated to the Index Interest Account and there have been no partial Withdrawals.
		In this example, also assume the following:
		• The ending Index Value on 10/1/2015 is 1,100
		(a) 1,100 - 1,000 = 100 (b) 100/1,000 = 10.00% (c) 10.00% x 100% = 10.00% (d) 10.00% - 2.00% = 8.00% (e) Greater of 8.00% or 0.00% = 8.00% (f) 1 + 0.00% = 1.00 (g) 8.00% x 1.00 = 8.00%
		Index Interest credited to the Index Interest Account = \$10,000 x 8.00% = \$800
		Example 2 – No activity before the end of an Index Term withou Index Interest credits.
		Assume that \$10,000 is allocated to the Index Interest Account, and there have been no partial Withdrawals.
		In this example, also assume the following:
		• The ending Index Value on 10/1/2015 is 900
		(a) 900 - 1,000 = -100 (b) -100/1,000 = -10.00% (c) -10.00% x 100.00% = -10.00% (d) -10.00% - 2.00% = -12.00% (e) Greater of -12.00% or 0.00% = 0.00% (f) 1 + 0.00% = 1.00 (g) 0.00% x 1.00 = 0.00%
		Index Interest Credited to Index Interest Account = \$10,000 x 0.00% =

SOV-AGE-8028 (4/14)

\$0.00

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Example 3 – Subsequent Premium Allocated before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account on the Contract Date, another \$5,000 is allocated to the Index Interest Account on 10/30/2014, and there have been no partial Withdrawals.

In this example, also assume the following:

- The ending Index Value on 10/1/2015 is 1,100
- There are 336 days between 10/30/2014 and 10/1/2015, the end of the Index Term
 - (a) 1,100 1,000 = 100
 - (b) 100/1,000 = 10.00%
 - (c) $10.00\% \times 100.00\% = 10.00\%$
 - (d) 10.00% 2.00% = 8.00%
 - (e) Greater of 8.00% and 0.00% = 8.00%
 - (f) 1 + 0.00% = 1.00
 - (g) $8.00\% \times 1.00 = 8.00\%$

Index Interest Credited to Index Interest Account = $(\$10,000 \times 8.00\%) + [(\$5,000 \times 8.00\%) \times (336/365)] = \$800 + \$368.22 = \$1,168.22$

Example 4 – Partial Withdrawal taken before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account and a partial Withdrawal of \$2,000 is taken on prior to the end of the Index Term.

In the example, also assume the following:

- There Index Value on 10/1/2015 is 1,100
 - (a) 1,100 1,000 = 100
 - (b) 100/1.000 = 10.00%
 - (c) $10.00\% \times 100.00\% = 10.00\%$
 - (d) 10.00% 2.00% = 8.00%
 - (e) Greater of 8.00% and 0.00% = 8.00%
 - (f) 1 + 0.00% = 1.00
 - (g) $8.00\% \times 1.00 = 8.00\%$

Index Interest Credited to the Index Interest Account = $(\$10,000 - \$2,000) \times 8.00\% = \$640$

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Example 5 – Death Claim occurs before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account and all Required Documentation for a death benefit claim is received at Our Annuity Service Center on 5/25/2015, and there have been no partial Withdrawals.

In the example, also assume the following:

- The Index Value on 5/25/2015 is 1,070
- There are 236 days between 10/1/2014 and 5/25/2015
 - (a) 1,070 1,000 = 70
 - (b) 70/1,000 = 7.00%
 - (c) $7.00\% \times 100.00\% = 7.00\%$
 - (d) 70.00% 2.00% = 5.00%
 - (e) Greater of 5.00% and 0.00% = 5.00%
 - (f) 1 + 0.00% = 1.00
 - (g) $5.00\% \times 1.00 = 5.00\%$

Index Interest Credited to the death benefit claim amount = $(\$10,000 \text{ x} 5.00\%) \times (236/365) = \323.29

Interest Bonus Rate Example:

Example 6 – Application of positive Interest Bonus Rate with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account and there have been no partial Withdrawals.

In this example, also assume the following:

- The ending Index Value on 10/1/2015 is 1,100
- The Interest Bonus Rate is 25.00%
 - (a) 1,100 1,000 = 100
 - (b) 100/1,000 = 10%
 - (c) $10\% \times 100\% = 10\%$
 - (d) 10.00% 2.00% = 8.00%
 - (e) Greater of 8.00% or 0.00% = 8.00%
 - (f) 1 + 25.00% = 1.25
 - (g) $8.00\% \times 1.25 = 10.00\%$

Index Interest credited to the Index Interest Account = \$10,000 x 10.00% = \$1.000

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Alternative language for a 5 year Index Term is below:

General Example Assumptions:

- The Index Term is 5 years
- The issue date is 10/1/2014
- \$10,000 is allocated to the Index Interest Account
- The Participation Rate is 100%
- The Annual Spread is 2.00%
- The Interest Bonus Rate is 0.00%
- The Index Values are as follows:

Date	Index Value
10/1/2014	1,000
10/1/2015	1,100
10/1/2016	1,150
10/1/2017	1,210
10/1/2018	1,170

General Examples:

Example 1 – No activity before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account and there have been no partial Withdrawals.

In this example, also assume the following:

- The ending Index Value on 10/1/2019 is 1,250
 - (a) 1.250 1.000 = 250
 - (b) 250/1,000 = 25%
 - (c) $25\% \times 100\% = 25\%$
 - (d) 1 + 4 = 5
 - (e) $5 \times 2.00\% = 10.00\%$
 - (f) 25% 10.00% = 15.00%
 - (g) Greater of 15.00% or 0.00% = 15.00%
 - (h) 1 + 0.00% = 1.00
 - (i) $15.00\% \times 1.00 = 15.00\%$

Index Interest credited to the Index Interest Account = \$10,000 x15.00% = \$1.500

Example 2 – No activity before the end of an Index Term without Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account, and there have been partial Withdrawals.

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

In this example, also assume the following:

- The ending Index Value on 10/1/2019 is 900
 - (a) 900 1,000 = -100
 - (b) -100/1,000 = -10.00%
 - (c) $-10.00\% \times 100.00\% = -10.00\%$
 - (d) 1 + 4 = 5
 - (e) $5 \times 2.00\% = 10.00\%$
 - (f) -10.00% 10.00% = -20.00%
 - (g) Greater of -20.00% or 0.00% = 0.00%
 - (h) 1 + 0.00% = 1.00
 - (i) $0.00\% \times 1.00 = 0.00\%$

Index Interest Credited to Index Interest Account = \$10,000 x 0.00% = \$0.00

Example 3 – Subsequent Premium allocated before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account on the Contract Date, another \$5,000 is allocated to the Index Interest Account on 10/30/2014, and there have been no partial Withdrawals.

In this example, also assume the following:

- The ending Index Value on 10/1/2019 is 1,140
- There are 1,797 days between 10/30/2014 and 10/1/2019, the end of the Index Term
- (a) 1.140 1.000 = 140
- (b) 140/1,000 = 14.00%
- (c) $14.00\% \times 100.00\% = 14.00\%$
- (d) 1+4=5
- (e) $5 \times 2.00\% = 10.00\%$
- (f) 14.00% 10.00% = 4.00%
- (g) Greater of 4.00% and 0.00% = 4.00%
- (h) 1 + 0.00% = 1.00
- (i) $4.00\% \times 1.00 = 4.00\%$

Index Interest Credited to Index Interest Account = $(\$10,000 \times 4.00\%) + [(\$5,000 \times 4.00\%) \times (1,797/1,826)] = \$400 + \$196.82 = \596.82

Example 4 – Partial Withdrawal taken before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account and a partial Withdrawal of \$2,000 is taken on 3/15/2017.

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

In the example, also assume the following:

- There have been two full years from 10/1/2014 until 3/15/2017
 - (a) 1,150 1,000 = 150
 - (b) 150/1,000 = 15.00%
 - (c) $15.00\% \times 100.00\% = 15.00\%$
 - (d) 1 + 2 = 3
 - (e) $3 \times 2.00\% = 6.00\%$
 - (f) 15.00% 6.00% = 9.00%
 - (g) Greater of 9.00% and 0.00% = 9.00%
 - (h) 1 + 0.00% = 1.00
 - (i) $9.00\% \times 1.00 = 9.00\%$

Index Interest Credited to the partial Withdrawal is (\$2,000 x 9.00%) x (2/5) = \$72. The total distributed partial Withdrawal amount is \$2,000 + \$72 = \$2,072.

Example 5 – Death Claim occurs before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account and all Required Documentation for a death benefit claim is received at Our Annuity Service Center on 5/25/2017, and there have been no partial Withdrawals.

In the example, also assume the following:

- The Index Value on 5/25/2017 is 1,200
- There are 967 days between 10/1/2014 and 5/25/2017
- There have been two full years from 10/1/2014 until 5/25/2017
 - (a) 1,200 1,000 = 200
 - (b) 200/1,000 = 20.00%
 - (c) $20.00\% \times 100.00\% = 20.00\%$
 - (d) 1 + 2 = 3
 - (e) $3 \times 2.00\% = 6.00\%$
 - (f) 20.00% 6.00% = 14.00%
 - (g) Greater of 14.00% and 0.00% = 14.00%
 - (h) 1 + 0.00% = 1.00
 - (i) $14.00\% \times 1.00 = 14.00\%$

Index Interest Credited to the death benefit claim amount is (\$10,000 x 14.00%) x (967/1,826) = \$741.40

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Example 6 – Full surrender occurs before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account on the Contract Date, a full surrender is taken on 12/20/2018, and there have been no partial Withdrawals.

In the example, also assume the following:

- There have been four full years from the beginning of the Index Term until the Contract Anniversary date prior to 12/20/2018
 - (a) 1,170 1,000 = 170
 - (b) 170/1,000 = 17.00%
 - (c) $17.00\% \times 100.00\% = 17.00\%$
 - (d) 1 + 4 = 5
 - (e) $5 \times 2.00\% = 10.00\%$
 - (f) 17.00% 10.00% = 7.00%
 - (g) Greater of 7.00% and 0.00% = 7.00%
 - (h) 1 + 0.00% = 1.00
 - (i) $7.00\% \times 1.00 = 7.00\%$

Index Interest Credited for full Surrender = ($$10,000 \times 7.00\%$) x (4/5) = \$560

Interest Bonus Rate Example:

Example 7 – Application of positive Interest Bonus Rate with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account and there have been no partial Withdrawals.

In this example, also assume the following:

- The ending Index Value on 10/1/2019 is 1,250
- The Interest Bonus Rate is 25.00%
 - (a) 1,250 1,000 = 250
 - (b) 250/1,000 = 25%
 - (c) $25\% \times 100\% = 25\%$
 - (d) 1 + 4 = 5
 - (e) $5 \times 2.00\% = 10.00\%$
 - (f) 25% 10.00% = 15.00%
 - (g) Greater of 15.00% or 0.00% = 15.00%
 - (h) 1 + 25.00% = 1.25
 - (i) $15.00\% \times 1.25 = 18.75\%$

Index Interest 3credited to the Index Interest Account = \$10,000 x 18.75% = \$1,875

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

Page 7	Transfers	Language is bracketed to include or exclude the language based on the duration of the Index Term. If the Index Term is longer than one year, the referenced language will be shown. If the Index Term is only one year in length, the referenced language will not be shown.
Last Page	Officer Signatures & Titles	Current signatures and titles shown. In the event of a change in company officers, the new officer's signature and title will be shown.

Form Number

Form Description

AGE-8003 (12/12) Annual Point-To-Point Index Interest Account Rider AGE-8005 (12/12) Monthly Point-To-Point Additive Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Annual Point-To-Point Index Interest Account Rider AGE-8003 (12/12)

	PAGE No.	BRACKETED VARIABLE TEXT	DESCRIPTION	
Ì	Rider Data	Rider Effective Date,	Customer specific information that will change for each contract	
	Page	Index Value on Rider	issued. This item depends on the date when the Rider is issued.	
ı	Diday Data	Effective Date	May reference Standard & Poor's®; S&P 500®; or S&P® which are	
1	Rider Data Page and Page 2	Index	trademarks of Standard & Poor's Financial Services LLC. An Index provider disclaimer regarding the Index may appear in the definition of the Index or elsewhere within the Rider. The index shown may change in the future for new issues of the contract and may include one or more of the following or any other broad major market indices:	
ı			NASDAQ 100 Index	
			• Dow 30 SM	
			S&P Midcap 400®	
			MSCI EAFE Index	
			Russell 1000 Index	
			Russell 2000 Index	
			Russell 3000 Index	
			Euro STOXX 50®	
			Hang Seng Index	
			NIKKEI 500 Index	
			 MSCI World Risk Control 10% Index 	
			 MSCI World Risk Control 12.5% Index 	
			 MSCI World Risk Control 15% Index 	
			 S&P 500 Daily Risk Control 15% Index 	
			 S&P 500 Daily Risk Control 12% Index 	
			S&P 500 Daily Risk Control 10% Index	
ı			The index is bracketed so we have flexibility to add or suppress	
			the index. If we suppress the index due to discontinuation of the	
			index, if the composition or the calculation of the index is	
			changed, or if we are not able to secure a license to continue	
			using the index, we may substitute an alternate, comparable	
			index. Any Index available will be determined by factors such as	
			then current economic conditions, expenses related to pricing,	
			actuarial and administrative considerations and specific	
			distribution systems marketing the contract,	

Deleted: Current information shown.

Deleted: The index is bracketed so we have flexibility to add or suppress the index. If we suppress the index due to discontinuation of the index, if the composition or the calculation of the index is changed, or if we are not able to secure a license to continue using the index, we may substitute an alternate, comparable index. Changes to the index will be submitted to the Department for approval prior to use.

Form Number

Form Description

AGE-8003 (12/12) Annual Point-To-Point Index Interest Account Rider AGE-8005 (12/12) Monthly Point-To-Point Additive Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

1		T	
	Rider Data Page	Index Term	Current information shown. The Index Term may change in the future for new issues of the contract and the range is from 1 year to 10 years.
	Rider Data Page	Initial Participation Rate	The Initial Participation Rate for the Annual Point-To-Point Index Interest Account Rider is shown. The Initial Participation Rate is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Participation Rate, and may change in the future for new issues of the contract. The range is from the Minimum Participation Rate to 200%. Any Participation Rates will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
	Rider Data Page	Minimum Participation Rate	The Minimum Participation Rate for the Annual Point-To-Point Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the life of the contract. It may change in the future for new issues of the contract. The range is from 0.25% to 100%. Any Minimum Participation Rates will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
	Rider Data Page	Initial Index Rate Cap	If applicable at contract issue, the Initial Index Rate Cap for the Annual Point-To-Point Index Interest Account Rider for each specific contract will be shown. The Initial Index Rate Cap is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Index Rate Cap and may change in the future for new issues of the contract. The range is from the Minimum Index Rate Cap to 25%. If referenced but not applicable, the word "None" will be shown. Any Index Rate Caps will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and
			specific distribution systems marketing the contract.

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Form Number

Form Description

AGE-8003 (12/12) Annual Point-To-Point Index Interest Account Rider AGE-8005 (12/12) Monthly Point-To-Point Additive Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

]	Rider Data Page	Minimum Index Rate Cap	If applicable, the Minimum Index Rate Cap for the Annual Point- To-Point Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the specified period of time during the life of the contract as shown. It
			may change in the future for new issues of the contract. The range of years is from 1 year to the life of the contract and the range for the Minimum Index Rate Cap is from 0.25% to 25%. If referenced but not applicable, the word "None" will be shown. Any Minimum Index Rate Caps will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific
			distribution systems marketing the contract.
	Last Page	Officer Signatures & Titles	Current signatures and titles shown. In the event of a change in company officers, the new officer's signature and title will be
			shown.

Monthly Point-To-Point Additive Index Interest Account Rider AGE-8005 (12/12)

PAGE No.	BRACKETED VARIABLE TEXT	DESCRIPTION
Rider Data Page	Rider Effective Date, Index Value on Rider Effective Date	Customer specific information that will change for each contract issued. This item depends on the date when the Rider is issued.
Rider Data Page and Page 2	Index	Current information shown. May reference Standard & Poor's®; S&P 500®; or S&P® which are trademarks of Standard & Poor's Financial Services LLC. An Index provider disclaimer regarding the Index may appear in the definition of the Index or elsewhere within the Rider. The index shown may change in the future for new issues of the contract and may include one or more of the following or any other broad major market indices:
		 ML Strategic BalancedSM NASDAQ 100 Index Dow 30SM

SOV Index Riders

Deleted: T

Form Number

Form Description

AGE-8003 (12/12) Annual Point-To-Point Index Interest Account Rider AGE-8005 (12/12) Monthly Point-To-Point Additive Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

		S&P Midcap 400® MSCI EAFE Index Russell 1000 Index Russell 2000 Index Russell 3000 Index MSCI World Risk Control 10% Index MSCI World Risk Control 12.5% Index MSCI World Risk Control 15% Index S&P 500 Daily Risk Control 15% Index S&P 500 Daily Risk Control 12% Index S&P 500 Daily Risk Control 10% Index The index is bracketed so we have flexibility to add or suppress the index. If we suppress the index due to discontinuation of the index, if the composition or the calculation of the index is changed, or if we are not able to secure a license to continue using the index, we may substitute an alternate, comparable index. Any Index available will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Index Term	Current information shown. The Index Term may change in the future for new issues of the contract and the range is from 1 year to 10 years.
Rider Data Page	Initial Participation Rate	The Initial Participation Rate for the Monthly Point-To-Point Additive Index Interest Account Rider will be shown. The Initial Participation Rate is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Participation Rate, and may change in the future for new issues of the contract. The range is from the Minimum Participation Rate to 200%. Any Participation Rates will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Minimum Participation Rate	The Minimum Participation Rate for the Monthly Point-To-Point Additive Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the life of the contract. It may change in the future for new issues of the

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Form Number

Form Description

AGE-8003 (12/12) Annual Point-To-Point Index Interest Account Rider AGE-8005 (12/12) Monthly Point-To-Point Additive Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

		contract. The range is from 0.25% to 100%. Any Minimum Participation Rates will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Initial Index Rate Cap	If applicable at contract issue, the Initial Index Rate Cap for the Monthly Point-To-Point Additive Index Interest Account Rider for each specific contract will be shown. The Initial Index Rate Cap is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Index Rate Cap and may change in the future for new issues of the contract. The range is from the Minimum Index Rate Cap to 25%. If referenced but not applicable, the word "None" will be shown. Any Index Rate Caps will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Minimum Index Rate Cap	If applicable, the Minimum Index Rate Cap for the Monthly Point-To-Point Additive Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the specified period of time during the life of the contract as shown. It may change in the future for new issues of the contract. The range of years is from 1 year to the life of the contract and the range for the Minimum Index Rate Cap is from 0.25% to 25%. If referenced but not applicable, the word "None" will be shown. Any Minimum Rate Caps will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Last Page	Officer Signatures & Titles	Current signatures and titles shown. In the event of a change in company officers, the new officer's signature and title will be shown.

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Form Number

Form Description

AGE-8024 (9/13) Periodic Average Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Periodic Average Index Interest Account Rider AGE-8024 (9/13)

	PAGE No.	BRACKETED VARIABLE TEXT	DESCRIPTION
	Rider Data Page	Rider Effective Date, Initial Index Term Start Date, Index Value on Rider Effective Date	Customer specific information that will change for each contract issued. This item depends on the date when the Rider is issued.
	Rider Data Page and Page 2	Index	Additional information about the index may be provided herein. The index shown may change in the future for new issues of the contract and may include one or more of the following or any other broad major market indices: S&P 500® ML Strategic BalancedSM NASDAQ 100 Index Dow 30SM S&P Midcap 400® MSCI EAFE Index Russell 1000 Index Russell 2000 Index Russell 3000 Index Euro STOXX 50® Hang Seng Index NIKKEI 500 Index MSCI World Risk Control 10% Index MSCI World Risk Control 15% Index MSCI World Risk Control 15% Index S&P 500 Daily Risk Control 15% Index S&P 500 Daily Risk Control 10% Index The index is bracketed so we have flexibility to add or suppress the index. If we suppress the index due to discontinuation of the index, if the composition or the calculation of the index is changed, or if we are not able to secure a license to continue using the index, we may substitute an alternate, comparable index. Any Index available will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
1	Rider Data Page	Index Term	"The Index Term may change in the future for new issues of the contract and the range is from 1 year to 10 years. Any Index Term will be determined by factors such as then current

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Form Number

Form Description

AGE-8024 (9/13) Periodic Average Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

			economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
	Rider Data Page	Averaging Mode	If the Averaging Mode is quarterly, the word "Quarterly" will show. Any Averaging Mode will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
I	Rider Data Page	First Date Included in Average, Last Date Included in Average, Number of Index Values Included in Average	"The range is from 1-120 to correspond with the number of years in an index term and depends on if the averaging mode is monthly or quarterly. Any Date Included in Average or Number of Index Values Included in Average will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
	Rider Data Page	Initial Participation Rate	If applicable at contract issue, the Initial Participation Rate for the Periodic Average Index Interest Account Rider will be shown. The Initial Participation Rate is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Participation Rate, and may change in the future for new issues of the contract. The
ĺ			range is from the Minimum Participation Rate to 200%. Any Participation Rates will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
	Rider Data Page	Minimum Participation Rate	If applicable, the Minimum Participation Rate for the Periodic Average Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the life of the contract. It may change in the future for new issues of the
			contract. The range is from 0.25% to 100%. Any Minimum Participation Rates will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
	Rider Data Page	Initial Spread	If applicable at contract issue, the Initial Spread percentage for the Periodic Average Index Interest Account Rider for each specific contract will be shown. If applicable the Initial Spread percentage is set at issue, is guaranteed for the Index Term, will not be greater than the Maximum Spread, and may change in the
			future for new issues of the contract. The percentage range is from 0% to the Maximum Spread. If referenced but not applicable, the word "None" will be shown. Any Initial Spread will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and

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Form Description

AGE-8024 (9/13) Periodic Average Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

			administrative considerations and specific distribution systems
	Rider Data Page	Maximum Spread	marketing the contract. If applicable, the Maximum Spread percentage for the Periodic Average Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the life of the contract. It may change in the future for new issues of the contract. The range of years is from 1 year to the life of the contract and the percentage range for the Maximum Spread is from 0% to 20%. If referenced but not applicable, the word "None" will be shown. Any Maximum Spread will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
	Rider Data Page	Initial Index Rate Cap	If applicable at contract issue, the Initial Index Rate Cap for the Periodic Average Index Interest Account Rider for each specific contract will be shown. The Initial Index Rate Cap is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Index Rate Cap and may change in the future for new issues of the contract. The range is from the Minimum Index Rate Cap to 25%. If referenced but not applicable, the word "None" will be shown. Any Index Rate Caps will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
	Rider Data Page	Minimum Index Rate Cap	If applicable, the Minimum Index Rate Cap for the Periodic Average Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the specified period of time during the life of the contract as shown. It may change in the future for new issues of the contract. The range of years is from 1 year to the life of the contract and the range for the Minimum Index Rate Cap is from 0.25% to 25%. If referenced but not applicable, the word "None" will be shown. Any Minimum Rate Caps will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
	Pages 2-9	"Monthly" and "Month"	If this rider is offered with a Quarterly Average, all references to "Monthly" or "Month" will be changed to reference "Quarterly", "Quarter" as applicable and will apply to prospectively issued Riders. Any mode will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Ц	Page 2	Index Term	"The range is from the 1st contract anniversary to the 10th contract

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Form Number

Form Description

AGE-8024 (9/13) Periodic Average Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

			anniversary. The Examples are bracketed to allow for future updates to keep the examples current.
	Page 4	Calculation of Index Interest Percentage	If the Number of Index Values Included in Average is less than the full number of months or quarters, as applicable, in an index term, the number that corresponds to the Number of Index Values Included in Average will print in lieu of "twelve (12)". Under the same circumstance, "last [x]" will be referenced in front of the words "[monthly] Index Values ending with" in the second sentence and x will be in a range from 1-120 months or quarters, as applicable. If the Number of Index Values Included in the Average equals the full number of months or quarters, as applicable, in an index term the words "last [x]" will not print.
			If the Number of Index Values Included in Average is less than the full number of months or quarters, as applicable, in an index term, the following will print in addition to the language shown in the Rider and the range for x is from 1-120 months or quarters, as applicable: "When an Income Plan begins less than [(x) months] following the beginning of an Index Term or in the event of payment of a death benefit less than [(x) months] following the beginning of an Index Term, the average of the [monthly] Index Values is calculated in the following manner. Add together the [monthly] Index Values since the beginning of such Index Term up to and including the [monthly] Index Value on the [Monthly] Anniversary immediately preceding the date such Income Plan begins or immediately preceding the date We receive all Required Documentation at Our Annuity Service Center for payment of the death benefit since the beginning of the Index Term, and divide that sum by the number of full [months] since the beginning of the
	Page 4	Calculation of Index Interest, 3 rd bullet	Index Term." If the Index Term is greater than 1-year, the number of days will be adjusted accordingly.
	Pages 5-9	Examples	The examples are bracketed and will be modified to reflect a quarterly Averaging Mode and/or an Index Term that is longer than one year, as applicable.
			An example that may be referenced is below:
			Example 1: Assume that \$10,000 is allocated to this Index Interest Account with a 3-year Index Term, a Spread, no Index Rate Cap, and the Contract is issued on January 5, 2014. Also assume that there have been no partial Withdrawals.
			In this example, assume the following:

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Form Description

AGE-8024 (9/13) Periodic Average Index Interest Account Rider

		 The First Date I The Last Date I The Number of The Participatio The Spread is 5 There is no Inde The beginning I 	5.00% ex Rate Cap ndex Value is 1,000 Index Values sho	s January 5, 2017
			Date	Index Value
			January 5, 2014	1,000
			April 5, 2014	1,050
			July 5, 2014	1,115
			October 5, 2014	1,190
			January 5, 2015	1,250
			April 5, 2015	1,100
			July 5, 2015	1,020
			October 5, 2015	980
			January 5, 2016	1,030
			April 5, 2016	1,040
			July 5, 2016	1,120
			October 5, 2016	1,080
			January 5, 2017	1,150
		1,030 + 1,040 + (b) 1,094 - 1,000 = (c) 94 / 1,000 = 9.4 (d) 9.40% x 100% = (e) 9.40% - 5.00% (f) 4.40% since the (g) Greater of 4.40%	1,120 + 1,080 + 1,15 94 0% = 9.40% = 4.40% ere is no Index Rate 0 % and 0.00% = 4.40%	Cap for comparison
		Index Interest Percenta Index Interest credited 4.40% = \$440		Account = \$10,000 x
Last Page	Officer Signatures & Titles	Current signatures and company officers, the shown.		

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

[N-Year] Point-To-Point With Annual Spread Index Interest Account Rider AGE-8028 (4/14)

PAGE No.	BRACKETED VARIABLE TEXT	DESCRIPTION
Rider Data Page	Rider Effective Date, Index Value on Rider Effective Date	Customer specific information that will change for each contract issued. This item depends on the date when the Rider is issued.
Rider Data Page and Page 2	Index	Additional information about the index may be provided herein. The index shown may change in the future for new issues of the contract and may include one or more of the following or any other broad major market indices: S&P 500® ML Strategic BalancedSM NASDAQ 100 Index Dow 30SM S&P Midcap 400® MSCI EAFE Index Russell 1000 Index Russell 2000 Index Russell 3000 Index Russell 3000 Index Hang Seng Index NIKKEI 500 Index MSCI World Risk Control 10% Index MSCI World Risk Control 12.5% Index MSCI World Risk Control 15% Index S&P 500 Daily Risk Control 12% Index S&P 500 Daily Risk Control 10% Index The index is bracketed so we have flexibility to add or suppress the index, if the composition or the calculation of the index is changed, or if we are not able to secure a license to continue using the index, we may substitute an alternate, comparable index.

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Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Rider Data Page, Page 2 and Page 7	"N-Year" and Index Term	"N" is a variable that represents the duration of the Index Term. The duration of the Index Term is set at contract issue and is guaranteed for the life of the Rider but could change for prospectively issued contracts. The Index Term may change in the future for new issues of the contract and the range is from 1 year to 10 years.
		When the Index Term ("N") is 1 year, the word "Annual" will be used in the title of the Rider as follows: "Annual Point-To-Point With Annual Spread Index Interest Account Rider. If "N" is other than 1, then the number will be referenced (example for a 2 Year Point-To-Point Rider: 2-Year Point-To-Point With Annual Spread Index Interest Account Rider".
		The example on page 2 under the definition of Index Term is bracketed to allow for updates to the examples to be consistent with the specific Index Term (i.e., if Annual, a one year period example will be shown; if a 2-Year term, a 2-Year period example will be shown).
		Any Index Term will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Initial Participation Rate	If applicable at contract issue, the Initial Participation Rate for the [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider is shown. The Initial Participation Rate is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Participation Rate, and may change in the future for new issues of the contract. The range is from the Minimum Participation Rate to 200%. Any Participation Rates will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Minimum Participation Rate	If applicable the Minimum Participation Rate for the [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the life of the contract. It may change in the future for new issues of the contract. The range is from 0.25% to 100%. Any Minimum Participation Rates will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.

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Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

Rider Data Page	Initial Annual Spread	If applicable at contract issue, the Initial Annual Spread for the [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider for each specific contract will be shown. The Initial Annual Spread is set at issue, is guaranteed for the Index Term, will not be less than the Maximum Annual Spread and may change in the future for new issues of the contract. The range is from 0% to the Maximum Annual Spread. If referenced, but not applicable, the word "None" will be shown. Any Annual Spreads will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Maximum Annual Spread	If applicable, the Maximum Annual Spread for the [N-Year] Annual Point-To-Point With Annual Spread Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the specified period of time during the life of the contract. It may change in the future for new issues of the contract. The range of years is from 1 year to the life of the contract and the range for the Maximum Annual Spread is from 0% to 20%. If referenced, but not applicable, the word "None" will be shown. Any Maximum Annual Spread will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Rider Data Page	Initial Interest Bonus Rate	If applicable at contract issue, the Initial Interest Bonus Rate for the [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider for each specific contract will be shown. The Initial Interest Bonus Rate is set at issue, is guaranteed for the Index Term, will not be less than the Minimum Interest Bonus Rate and may change in the future for new issues of the contract. The range is from the Minimum Interest Bonus Rate to 100%. If referenced, but not applicable, the word "None" will be shown. Any Initial Interest Bonus Rate will be determined by factors such as then current economic conditions, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.

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Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Rider Data Page	Minimum Interest Bonus Rate	If applicable, the Minimum Interest Bonus Rate for the [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider for each specific contract will be shown. It will be set at issue and guaranteed for the life of the contract. It may change in the future for new issues of the contract. The range for the Minimum Interest Bonus Rate is from 0% to 100%. If referenced, but not applicable, the word "None" will be shown. Any Minimum Interest Bonus Rate will be determined by factors such as then current economic condition, expenses related to pricing, actuarial and administrative considerations and specific distribution systems marketing the contract.
Page 3	Partial Index Interest	The section titled Partial Index Interest is bracketed to either include the language shown on the Rider when the index term is greater than 1-Year or exclude it when the index term is 1-Year. When the index term is 1-Year, the following will be referenced: Since Index Interest is determined at the end of each Index Term, no Index Interest will be credited to: "1. the amount paid as a full surrender occurring prior to the end of an Index Term; or 2. the amount paid as a partial Withdrawal occurring prior to the end of an Index Term. Upon payment of a death benefit or when an Income Plan begins, partial Index Interest will be credited to any values that are allocated to the Index Interest Account, as described in this Rider and the Contract."

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Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

Γ	Pages 3-4	Calculation of Index	The language is bracketed to include the language shown on the
	r agos o r	Interest Percentage	Rider when the Index Term is greater than 1-Year and includes an Annual Spread. When the Index Term is 1-Year, then the following language will be referenced:
			The Index Interest Percentage calculation will be performed as follows:
			 (a) Equals the ending Index Value minus the beginning Index Value (b) Equals (a) divided by the beginning Index Value (c) Equals (b) multiplied by the Participation Rate (d) Equals (c) minus the Annual Spread (e) Equals the greater of (d) or zero percent (f) Equals 1 plus the Interest Bonus Rate (g) Equals (e) multiplied by (f); which is the Index Interest Percentage
			The ending Index Value is the Index Value on: 1) the last day of the Index Term; or 2) the date an Income Plan begins or the date We receive all Required Documentation at our Annuity Service Center for payment of the death benefit.
	Page 4	Calculation of Index Interest: 2 nd Bullet	The following language: "adjusted for Index Interest credited" is bracketed to allow for inclusion or exclusion of the language. When the Index Term is greater than 1-Year, the language will be referenced. When the Index Term is 1-Year, the language will not be referenced.
	Page 4	Calculation of Index Interest: 4 th Bullet Example	The example is bracketed to allow for flexibility to show an example that is relative to the index term. If the index term is for 1 year, the example will be for a 1-Year period; if the index term is for more than 1-Year, the example will be for longer than a 1-Year period.
	Page 4	Calculation of Index Interest: 5 th Bullet	The language is bracketed to allow for inclusion or exclusion of the language. When the Index Term is greater than 1-Year, the language will be referenced. When the Index Term is 1-Year, the language will not be referenced.

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Page 5	General Example Assumptions	The General Example Assumptions section is bracketed to allow for flexibility relative to the index term. Referenced language in the Rider is applicable to a 2-Year index term. The number of years is bracketed for the Index Term to allow for flexibility to show the applicable number of years in the index term in the General Examples. Examples of alternative language for a 1-Year index term are below and the referenced table in the Rider will not be referenced for a 1-Year index term. Alternative Language:
		General Example Assumptions:
		 The Index Term is [1 year] The issue date is 10/1/2014 \$10,000 is allocated to the Index Interest Account The Participation Rate is 100% The Annual Spread is 2.00% The Interest Bonus Rate is 0.00% The Index Value on 10/1/2014 is 1,000

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Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Pages 5-7	General Examples	General Examples are bracketed to allow for flexibility to show examples on the Rider relative to the Index Term (i.e., if a 2-Year term the examples will be for a 2-Year term). Alternative examples are below for a 1-Year index term. Alternative Language:
		General Examples: Example 1 – No activity before the end of an Index Term with Index Interest credits. Assume that \$10,000 is allocated to the Index Interest Account and there have been no partial Withdrawals.
		In this example, also assume the following:
		• The ending Index Value on 10/1/2015 is 1,100
		(a) 1,100 - 1,000 = 100 (b) 100/1,000 = 10.00% (c) 10.00% x 100% = 10.00% (d) 10.00% - 2.00% = 8.00% (e) Greater of 8.00% or 0.00% = 8.00% (f) 1 + 0.00% = 1.00 (g) 8.00% x 1.00 = 8.00%
		Index Interest credited to the Index Interest Account = \$10,000 x 8.00% = \$800
		Example 2 – No activity before the end of an Index Term without Index Interest credits. Assume that \$10,000 is allocated to the Index Interest Account, and there have been no partial Withdrawals.
		In this example, also assume the following:
		• The ending Index Value on 10/1/2015 is 900
		(a) 900 – 1,000 = -100 (b) -100/1,000 = -10.00% (c) -10.00% x 100.00% = -10.00% (d) -10.00% - 2.00% = -12.00% (e) Greater of -12.00% or 0.00% = 0.00%

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Index Interest Credited to Index Interest Account = \$10,000 x 0.00% = \$0.00

(f) 1 + 0.00% = 1.00(g) $0.00\% \times 1.00 = 0.00\%$

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Example 3 – Subsequent Premium Allocated before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account on the Contract Date, another \$5,000 is allocated to the Index Interest Account on 10/30/2014, and there have been no partial Withdrawals.

In this example, also assume the following:

- The ending Index Value on 10/1/2015 is 1,100
- There are 336 days between 10/30/2014 and 10/1/2015, the end of the Index Term
 - (a) 1,100 1,000 = 100
 - (b) 100/1,000 = 10.00%
 - (c) $10.00\% \times 100.00\% = 10.00\%$
 - (d) 10.00% 2.00% = 8.00%
 - (e) Greater of 8.00% and 0.00% = 8.00%
 - (f) 1 + 0.00% = 1.00
 - (g) $8.00\% \times 1.00 = 8.00\%$

Index Interest Credited to Index Interest Account = $(\$10,000 \times 8.00\%) + [(\$5,000 \times 8.00\%) \times (336/365)] = \$800 + \$368.22 = \$1,168.22$

Example 4 – Partial Withdrawal taken before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account and a partial Withdrawal of \$2,000 is taken on prior to the end of the Index Term.

In the example, also assume the following:

- There Index Value on 10/1/2015 is 1,100
 - (a) 1,100 1,000 = 100
 - (b) 100/1,000 = 10.00%
 - (c) $10.00\% \times 100.00\% = 10.00\%$
 - (d) 10.00% 2.00% = 8.00%
 - (e) Greater of 8.00% and 0.00% = 8.00%
 - (f) 1 + 0.00% = 1.00
 - (g) $8.00\% \times 1.00 = 8.00\%$

Index Interest Credited to the Index Interest Account = $(\$10,000 - \$2,000) \times 8.00\% = \$640$

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Example 5 – Death Claim occurs before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account and all Required Documentation for a death benefit claim is received at Our Annuity Service Center on 5/25/2015, and there have been no partial Withdrawals.

In the example, also assume the following:

- The Index Value on 5/25/2015 is 1,070
- There are 236 days between 10/1/2014 and 5/25/2015
 - (a) 1,070 1,000 = 70
 - (b) 70/1,000 = 7.00%
 - (c) $7.00\% \times 100.00\% = 7.00\%$
 - (d) 70.00% 2.00% = 5.00%
 - (e) Greater of 5.00% and 0.00% = 5.00%
 - (f) 1 + 0.00% = 1.00
 - (g) $5.00\% \times 1.00 = 5.00\%$

Index Interest Credited to the death benefit claim amount = (\$10,000 x 5.00%) x (236/365) = \$323.29

Interest Bonus Rate Example:

Example $\mathbf{6}$ – Application of positive Interest Bonus Rate with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account and there have been no partial Withdrawals.

In this example, also assume the following:

- The ending Index Value on 10/1/2015 is 1,100
- The Interest Bonus Rate is 25.00%
 - (a) 1,100 1,000 = 100
 - (b) 100/1,000 = 10%
 - (c) $10\% \times 100\% = 10\%$
 - (d) 10.00% 2.00% = 8.00%
 - (e) Greater of 8.00% or 0.00% = 8.00%
 - (f) 1 + 25.00% = 1.25
 - (g) $8.00\% \times 1.25 = 10.00\%$

Index Interest credited to the Index Interest Account = \$10,000 x 10.00% = \$1,000

Form Number

Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Alternative language for a 5 year Index Term is below:

General Example Assumptions:

- The Index Term is 5 years
- The issue date is 10/1/2014
- \$10,000 is allocated to the Index Interest Account
- The Participation Rate is 100%
- The Annual Spread is 2.00%
- The Interest Bonus Rate is 0.00%
- The Index Values are as follows:

Date	Index Value
10/1/2014	1,000
10/1/2015	1,100
10/1/2016	1,150
10/1/2017	1,210
10/1/2018	1,170

General Examples:

Example 1 - No activity before the end of an Index Term with Index Interest credits.

Assume that $\$10,\!000$ is allocated to the Index Interest Account and there have been no partial Withdrawals.

In this example, also assume the following:

- The ending Index Value on 10/1/2019 is 1,250
 - (a) 1,250 1,000 = 250
 - (b) 250/1,000 = 25%
 - (c) $25\% \times 100\% = 25\%$
 - (d) 1 + 4 = 5
 - (e) $5 \times 2.00\% = 10.00\%$
 - (f) 25% 10.00% = 15.00%
 - (g) Greater of 15.00% or 0.00% = 15.00%
 - (h) 1 + 0.00% = 1.00
 - (i) $15.00\% \times 1.00 = 15.00\%$

Index Interest credited to the Index Interest Account = \$10,000 x 15.00% = \$1,500

Example 2 – No activity before the end of an Index Term without Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account, and there have been ono partial Withdrawals.

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AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

In this example, also assume the following:

- The ending Index Value on 10/1/2019 is 900
 - (a) $900 1{,}000 = -100$
 - (b) -100/1,000 = -10.00%
 - (c) $-10.00\% \times 100.00\% = -10.00\%$
 - (d) 1+4=5
 - (e) $5 \times 2.00\% = 10.00\%$
 - (f) -10.00% 10.00% = -20.00%
 - (g) Greater of -20.00% or 0.00% = 0.00%
 - (h) 1 + 0.00% = 1.00
 - (i) $0.00\% \times 1.00 = 0.00\%$

Index Interest Credited to Index Interest Account = \$10,000 x 0.00% = \$0.00

Example 3 – Subsequent Premium allocated before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account on the Contract Date, another \$5,000 is allocated to the Index Interest Account on 10/30/2014, and there have been no partial Withdrawals.

In this example, also assume the following:

- The ending Index Value on 10/1/2019 is 1,140
- There are 1,797 days between 10/30/2014 and 10/1/2019, the end of the Index Term
- (a) 1,140 1,000 = 140
- (b) 140/1,000 = 14.00%
- (c) $14.00\% \times 100.00\% = 14.00\%$
- (d) 1+4=5
- (e) $5 \times 2.00\% = 10.00\%$
- (f) 14.00% 10.00% = 4.00%
- (g) Greater of 4.00% and 0.00% = 4.00%
- (h) 1 + 0.00% = 1.00
- (i) $4.00\% \times 1.00 = 4.00\%$

Index Interest Credited to Index Interest Account = $(\$10,000 \times 4.00\%) + [(\$5,000 \times 4.00\%) \times (1,797/1,826)] = \$400 + \$196.82 = \596.82

Example 4 - Partial Withdrawal taken before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account and a partial Withdrawal of \$2,000 is taken on 3/15/2017.

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Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

In the example, also assume the following:

- There have been two full years from 10/1/2014 until 3/15/2017
 - (a) 1,150 1,000 = 150
 - (b) 150/1,000 = 15.00%
 - (c) $15.00\% \times 100.00\% = 15.00\%$
 - (d) 1 + 2 = 3
 - (e) $3 \times 2.00\% = 6.00\%$
 - (f) 15.00% 6.00% = 9.00%
 - (g) Greater of 9.00% and 0.00% = 9.00%
 - (h) 1 + 0.00% = 1.00
 - (i) $9.00\% \times 1.00 = 9.00\%$

Index Interest Credited to the partial Withdrawal is $(\$2,000 \times 9.00\%) \times (2/5) = \72 . The total distributed partial Withdrawal amount is \$2,000 + \$72 = \$2,072.

Example 5 – Death Claim occurs before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account and all Required Documentation for a death benefit claim is received at Our Annuity Service Center on 5/25/2017, and there have been no partial Withdrawals.

In the example, also assume the following:

- The Index Value on 5/25/2017 is 1,200
- There are 967 days between 10/1/2014 and 5/25/2017
- There have been two full years from 10/1/2014 until 5/25/2017
 - (a) 1,200 1,000 = 200
 - (b) 200/1,000 = 20.00%
 - (c) $20.00\% \times 100.00\% = 20.00\%$
 - (d) 1 + 2 = 3
 - (e) $3 \times 2.00\% = 6.00\%$
 - (f) 20.00% 6.00% = 14.00%
 - (g) Greater of 14.00% and 0.00% = 14.00%
 - (h) 1 + 0.00% = 1.00
 - (i) $14.00\% \times 1.00 = 14.00\%$

Index Interest Credited to the death benefit claim amount is (\$10,000 x 14.00%) x (\$967/1,826) = \$741.40

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Form Description

AGE-8028 (4/14) [N-Year] Point-To-Point With Annual Spread Index Interest Account Rider

This Statement of Variability identifies and explains the variable items, denoted by brackets, contained in the above referenced Index Interest Account Riders. Any changes within these areas will be administered in accordance with the requirements of your state, including any requirements for prior approval of a change.

Example 6 – Full surrender occurs before the end of an Index Term with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account on the Contract Date, a full surrender is taken on 12/20/2018, and there have been no partial Withdrawals.

In the example, also assume the following:

- There have been four full years from the beginning of the Index Term until the Contract Anniversary date prior to 12/20/2018
 - (a) 1,170 1,000 = 170
 - (b) 170/1,000 = 17.00%
 - (c) $17.00\% \times 100.00\% = 17.00\%$
 - (d) 1 + 4 = 5
 - (e) $5 \times 2.00\% = 10.00\%$
 - (f) 17.00% 10.00% = 7.00%
 - (g) Greater of 7.00% and 0.00% = 7.00%
 - (h) 1 + 0.00% = 1.00
 - (i) $7.00\% \times 1.00 = 7.00\%$

Index Interest Credited for full Surrender = ($10,000 \times 7.00\%$) x (4/5) = 560

Interest Bonus Rate Example:

Example 7 – Application of positive Interest Bonus Rate with Index Interest credits.

Assume that \$10,000 is allocated to the Index Interest Account and there have been no partial Withdrawals.

In this example, also assume the following:

- The ending Index Value on 10/1/2019 is 1,250
- The Interest Bonus Rate is 25.00%
 - (a) 1,250 1,000 = 250
 - (b) 250/1,000 = 25%
 - (c) $25\% \times 100\% = 25\%$
 - (d) 1+4=5
 - (e) $5 \times 2.00\% = 10.00\%$
 - (f) 25% 10.00% = 15.00%
 - (g) Greater of 15.00% or 0.00% = 15.00%
 - (h) 1 + 25.00% = 1.25
 - (i) $15.00\% \times 1.25 = 18.75\%$

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Index Interest 3 credited to the Index Interest Account = \$10,000 x 18.75% = \$1,875

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Page 7	Transfers	Language is bracketed to include or exclude the language based on the duration of the Index Term. If the Index Term is longer than one year, the referenced language will be shown. If the Index Term is only one year in length, the referenced language will not be shown.
Last Page	Officer Signatures & Titles	Current signatures and titles shown. In the event of a change in company officers, the new officer's signature and title will be shown.